

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Cox Airparts LLC, a Kansas limited liability company;

Plaintiff,

v.

Kevin Brown, and Jane Doe Brown  
husband and wife, Michael and Andrea  
Polve, husband and wife,  
MJP Services, LLC, an Arizona limited liability company;

Defendants.

Case No.: CV-23-1466-PHX-SMB

**DECLARATION OF DAVID  
DUTTON IN SUPPORT OF  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT**

**(Jury Trial Demanded)**

I, David Dutton, make the following declarations in support of the 1<sup>st</sup> Amended Complaint in the above captioned case:

1. I am over the age of 18 and competent to make this declaration.
2. I am employed by Aircraft Accessories of Oklahoma.
3. Aircraft Accessories of Oklahoma is an FAA approved repair station rated in Class I and Class II aircraft accessories and has been in business for over 60 years.
4. In April 2022, Kevin Brown dba Arizona Aircraft Accessories contacted us by email and offered to sell us various aircraft parts.
5. We knew and trusted Kevin Brown based on previous business transactions with him and his father.

6. Based on representations by Kevin Brown, we agreed to terms purchase parts as reflected on Purchase Order PO22-825, and paid \$10000 by ACH payment to beneficiary, "MJP Services (...7663)". **Exhibit B1** is a true and accurate copy of PO22-825 and the payment details.
7. While we were waiting for the parts in the first Purchase Order, Kevin Brown contacted us and offered to sell us various additional aircraft parts.
8. We agreed to purchase the additional aircraft parts for \$16,495.98, on terms with ½ payment upfront with the other half paid on inspection.
9. We prepared Purchase Order PO22-908 and wired \$8250 to beneficiary as ½ payment to, "MJP Services, LLC, with an address of 11261 E Stearn Ave, Mesa AZ, 85212-7069 US". **Exhibit B2** is a true and accurate copy of PO22-825 and wire receipt for payment.
10. We never received the parts on Purchase Order PO22-825 or PO22-908, for which we demanded delivery or refunds, but Kevin Brown refused to honor the terms of the purchase orders or refund our payments.
11. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. This declaration is executed in ~~Terra Bella California~~ Tulsa Oklahoma on the date indicated below. (DD)

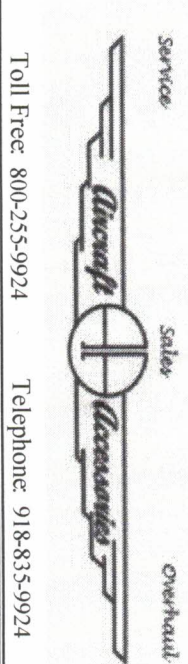
  
\_\_\_\_\_  
David Dutton, Aircraft Accessories of  
Oklahoma

09/14/2023  
Date

# Exhibit B1

2740 N. Sheridan Rd.  
Tulsa, Oklahoma 74115  
RS# RV3R829L

sales@airacc.com  
www.aircraftaccessoriesofok.com



**PURCHASE ORDER**  
**P022-825**

Issued on: 4/8/2022

FEIN: 73-0945940

Toll Free: 800-255-9924 Telephone: 918-835-9924

Fax: 918-835-3681

ARIZONA AIRCRAFT ACCESSORIES 566 E GERMANN RD GILBERT, Arizona 85297 United States		Aircraft Accessories of Oklahoma 2740 N Sheridan Rd Tulsa, Oklahoma 74115 United States	Aircraft Accessories of Oklahoma 2740 N Sheridan Rd Tulsa, Oklahoma 74115 United States
VENDOR		CUSTOMER	SHIP TO
P: 480-883-5812 F: 480-396-3727		P: 918-835-9924	

Item Qty	Part number	Part/Item Description	Condition	Cost	Extended Cost
1	4	23048-1031	ARMATURE	Rewind	769.23 USD 3,076.92 USD
2	1	23048-1032	ARMATURE	Rewind	769.23 USD 769.23 USD
3	1	23079-1020	ARMATURE	Rewind	769.23 USD 769.23 USD
4	1	23078-1471	ARMATURE (RWD)	Rewind	769.23 USD 769.23 USD
5	1	23085-1503	ARMATURE	Rewind	769.23 USD 769.23 USD
6	2	23048-1031	ARMATURE	Rewind	769.23 USD 1,538.46 USD
7	1	200SGL1156-5	STATOR (rewind)	Rewind	769.23 USD 769.23 USD
8	1	300SG1156	STATOR	Rewind	769.23 USD 769.23 USD
9	1	23065-310	FIELD ASSY	Rewind	769.24 USD 769.24 USD

**Comments: "Free shipping" "Refund policy is 30days. If there is any warranty we have no problem sending it back to Aircraft Components rewind."**

P.O. Total: 10,000.00 USD

Components rewind."

Pay by WIRE ACH

There is no requirement for shipping insurance. DO NOT INSURE!

Please remit invoices to dmensing@airacc.com



Payment details

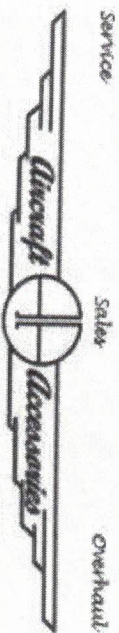
MJP Services (...7663)

Pay from	PLAT BUS CHECKING (...2676)
Pay to	MJP Services (...7663)
Amount	\$10,000.00
Send on	Apr 11, 2022
Deliver by	Apr 12, 2022
Delivery method	Standard ACH
Payment arrives in	1 business day
Addenda	INV 10216
Status	Paid
Submitted by	Not Available, Apr 11, 2022 02:44:45 PM ET
Chase transaction number	5330591291

# Exhibit B2



2740 N. Sheridan Rd.  
Tulsa, Oklahoma 74115  
RS# RV3R829L  
sales@airacc.com  
www.aircraftaccessoriesofok.com  
FEIN: 73-0945940



PURCHASE ORDER  
PO22-908

Toll Free: 800-255-9924 Telephone: 918-835-9924

Issued on: 4/18/2022  
Fax: 918-835-3681

ARIZONA AIRCRAFT ACCESSORIES 566 E GERMANN RD TULBERT, Arizona 85297 United States		Aircraft Accessories of Oklahoma 2740 N Sheridan Rd Tulsa, Oklahoma 74115 United States		Aircraft Accessories of Oklahoma 2740 N Sheridan Rd Tulsa, Oklahoma 74115 United States	
VENDOR		CUSTOMER		SHIP TO	
P: 480-883-5812 F: 480-396-3727		P: 918-835-9924			

Item	Qty	Part number	Part/Item Description	Condition	Cost	Extended Cost
1		150SG117Q	STARTER GENERATOR	Core	868.42 USD	868.42 USD
2		150SG119Q	Starter-Generator	Core	868.42 USD	1,736.84 USD
2		150SG122Q	STARTER GENERATOR	Core	868.42 USD	1,736.84 USD
2		23081-018	STARTER GENERATOR	Core	868.42 USD	1,736.84 USD
2		23048-004	STRT GEN	Core	868.42 USD	1,736.84 USD
1		23045-045	Starter-Generator	Core	868.42 USD	868.42 USD
1		23032-042	Starter-Generator	Core	868.42 USD	868.42 USD
1		23079-000-1	STARTER GENERATOR	Core	868.42 USD	868.42 USD
1		23048-018	STARTER GENERATOR	Core	868.42 USD	868.42 USD
3		23046-020	STARTER GENERATOR	Core	864.42 USD	864.42 USD
3		300SGL129Q	STARTER GENERATOR	Core	868.42 USD	2,605.26 USD

Comments: 1/2 payment upfront \$8,250.00. other half upon receipt/inspection \$8,250.00  
\*They will cover the wire transfer.  
\*\*ALL overhauled units LESS 8130-3 tags.

P.O. Total: 16,495.98 USD

This is no requirement for shipping insurance. DO NOT INSURE!  
Please remit invoices to dmensing@airacc.com



Printed from Chase for Business

PLAT BUS CHECKING (...2676)

-\$8,250.00

Outgoing wire transfer

Apr 19, 2022  
Posted date

CHASUS33  
SWIFT/FED/CHIP ID

PLAT BUS  
CHECKING (...2676)  
Account name

3022402109ES  
Transaction ID

Beneficiary information

Account ....7663  
  
Name MJP SERVICES, LLC  
  
Address 11261 E STEARN AVE MESA AZ  
85212-7069 US

Bank information

Related references BMG OF 22/04/19

Additional information

Additional information INV 10220 AIRCRAFT  
ACCESSORIES OF O KLAHOMA

For transaction details, please refer to the periodic statement for the official record of this transaction. For outgoing payments you may also access up to 13 months of wire transfer history from the Wire activity/Global activity page.